

308 Building/2A
January 15, 2003



Document Processing Desk - 6(a)(2)
Office of Pesticide Programs - 7504C
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: FIFRA § 6(a)(2) Report
Vikane* Gas Fumigant
EPA Registration Number: 62719-4
Active Ingredient: Sulfuryl Fluoride
CAS Registry Number: 002699-79-8
DERBI Number: 129180
State: FL
Severity Category: H-C

Dow AgroSciences submits the following information in response to its understanding of the U.S. Environmental Protection Agency's interpretation of FIFRA § 6(a)(2). However, Dow AgroSciences has not concluded that this information regards an "unreasonable adverse effect on the environment" or that it is reportable under FIFRA § 6(a)(2).

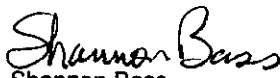
Dow AgroSciences received the enclosed information regarding alleged human exposure.

It is important to note that the Vikane Gas Fumigant label requires the introduction of chloropicrin to the structure prior to fumigation at a rate of one ounce per 10,000-15,000 feet (17-25 ppm) to serve as a warning agent. This warning agent causes smarting of eyes, tearing, throat and nose irritation, and a disagreeable pungent odor at very low concentrations (ca. 0.3 ppm).

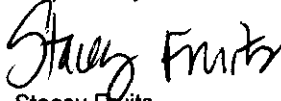
The Vikane Gas Fumigant label states the following: "When fumigating, observe local, state and federal rules and regulations including such things as use of chloropicrin, clearing devices, positive-pressure self contained breathing apparatus, security requirements, and placement of warning signs:... Extremely Hazardous Liquid and Vapor Under Pressure, Inhalation of Vapors may be Fatal." Under the "Preparation for Fumigation" section of the label, the use directions for structural fumigation state "Remove from the structure to be fumigated all persons, domestic animals, pets - including fish and desirable growing plants." Also, under the Aeration and Reentry section of the label, use directions state "... treated area must be aerated until the level of sulfuryl fluoride is 5 ppm or less, as measured by a detection device with sufficient sensitivity such as an INTERSCAN or MIRAN gas analyzer." Within this section of the label it further states "Do not reoccupy fumigation site, i.e. building, ship, vehicle or chamber, nor move vehicle until aeration is complete."

If you wish to discuss this matter further, please call us.

Regards,


Shannon Bass
EH&S Global Product Leader
(317) 337-4983

Prepared by:


Stacey Fruits
Product Stewardship Administrator
(317) 337-4577

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Voluntary Industry Reporting Form for 6(a)(2) Adverse Effects Incident Information

Provide all known, required information. If required data field information is unknown, designate as such in appropriate area. Page# 1 of 3

Row 1	Reporter Name	Submission date.	Contact person (if different than reporter)	Internal ID 1-6720043
Administrative Data	Address		Address	
	Phone #		Phone #	
	Incident Status: <i>New</i>	Location and date of incident <i>Hollywood Florida 12/7/02</i>	Date registrant became aware of incident. <i>12/9/02</i>	Was incident part of larger study? <i>No</i>
Row 2	EPA Registration # (Product 1) <i>62719-4</i>	EPA Registration # (Product 2)	EPA Registration # (Product 3)	
	A.I. (s) <i>Sulfuryl Fluoride</i>	A.I. (s)	A.I. (s)	
	Product 1 name <i>Vikane</i>	Product 2 Name	Product 3 Name	
	Exposed to concentrate prior to dilution? <i>No</i>	Exposed to concentrate prior to dilution?	Exposed to concentrate prior to dilution?	
	Formulation	Formulation	Formulation	
Row 3	Evidence label directions were not followed? <i>No</i>	Incident site: (examples include home, yard, school, industrial, nursery/greenhouse, surface water, commercial turf, building/office, forest/ woods, agricultural (specify crop) right-of-way (rail, utility, highway)). <i>Own Residence</i>	Situation (act of using product): (examples include mixing/loading, reentry, application, transportation, repair/ maintenance of application equipment, manufacturing/ formulating). <i>Re-entry</i>	
	Intentional misuse? <i>No</i>			
	Applicator certified PCO? <i>Not applicable</i>			
Incident Circumstances	How exposed: (examples include direct contact with treated surface, ingestion, spill, drift, runoff) <i>See Incident Description</i>			

DERBI: 129180
Report: Yes ☒ No ☐
If no, Why:
Date: 12/14/02

Brief description of incident circumstances.

12/9/02 1:42:28 PM no epa

HX: Caller's house tented. Husband and caller came back when given all clear by PCO. Both people started having eye irritation and tearing. Opened windows and sxs cleared in <2 hrs.

Prior to tenting, caller developed a chest cold. Caller also has multiple chemical sensitivity, chronic fatigue syndrome, fibromyalgia, allergies (to everything) and asthma.

After eye's cleared, caller (pt K) started having resp irritation, difficulty breathing, SOB, wheezing. Finally went to ER for MD eval and treatment (breathing treatments and unknown medications)

A: Discussed that the chloropicrin is a lacrimator added to the Vikane process as a warning agent, since Vikane is colorless/odorless gas. Chloropicrin is a strong acute irritant and can cause eye tearing and irritation. As noted, this cleared up with fresh air to house. Also as noted, pt (A) did not have any further sxs. However, pt (K) - caller's lungs were already compromised by having a cold, allergies, and asthma. Chloropicrin can potentially irritate resp system and aggravate existing conditions.

Caller very satisfied with data and stated she is a nurse and can understand this data.

cb prn.

Voluntary Industry Reporting Form for 6(a)(2) Incident Information Involving Humans

Provide all known, required information. If required data field information is unknown, designate as such in appropriate area. Page# 3 of 3

Demographic information: Age: 52 Years Sex: Female Occupation (if relevant)	Exposure route: Inhalation Ocular	Was adverse effect result of suicide/homicide or attempted suicide/homicide? No	Was protective clothing worn (specify)? Not applicable
If female, pregnant? DNQ	Was exposure occupational? No If yes, days lost due to illness:	Time between exposure and onset of symptoms: See Symptoms	
Type of medical care sought: (examples include none, clinic, hospital emergency department, private physician, PCC, hospital inpatient). HCF	List signs/symptoms/adverse effects Ocular Irritation/pain - 15 min or less , Lacrimation - 15 min or less , Respiratory irritation - 3 hrs or less , Shortness of breath - 3 hrs or less , Wheezing - 3 hrs or less ,		If lab tests were performed, list test names and results (If available, submit reports)
Exposure data: Amount of pesticide: Exposure duration: Weight:			
Human severity category: HC			

This box can be used to provide any explanatory or qualifying information surrounding the incident. (add additional pages if necessary)

Re-entry into a treated dwelling is not permitted until Vikane levels drop below 5 ppm, a level known to be well below the threshold for potential toxicity. Chloropicrin, a lacrimating warning agent, is also used with Vikane and may produce eye irritation and upper respiratory irritation. Chloropicrin would typically have dissipated by the time the tenants returned to the residence.

Internal ID #
1-6720043

Voluntary Industry Reporting Form for 6(a)(2) Incident Information Involving Humans

Provide all known, required information. If required data field information is unknown, designate as such in appropriate area. Page# 3 of 3

Demographic information: Age: 57 Years Sex: Male Occupation (if relevant)	Exposure route: Ocular	Was adverse effect result of suicide/homicide or attempted suicide/homicide? No	Was protective clothing worn (specify)? Not applicable
If female, pregnant? DNQ	Was exposure occupational? No If yes, days lost due to illness:	Time between exposure and onset of symptoms: See Symptoms	
Type of medical care sought: (examples include none, clinic, hospital emergency department, private physician, PCC, hospital inpatient). On-site	List signs/symptoms/adverse effects Ocular Irritation/pain - 15 min or less , Lacrimation - 15 min or less ,		If lab tests were performed, list test names and results (If available, submit reports)
Exposure data: Amount of pesticide: Exposure duration: Weight:			
Human severity category: HD			

This box can be used to provide any explanatory or qualifying information surrounding the incident. (add additional pages if necessary)

Re-entry into a treated dwelling is not permitted until Vikane levels drop below 5 ppm, a level known to be well below the threshold for potential toxicity. Chloropicrin, a lacrimating warning agent, is also used with Vikane and may produce eye irritation and upper respiratory irritation. Chloropicrin would typically have dissipated by the time the tenants returned to the residence.

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